



UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

Paul Hansmeier,
Plaintiff,

v.

Jeffrey Fikes, et al.,
Defendants.

Case No. 21-cv-1979

SUPPLEMENTAL AFFIDAVIT
OF PAUL HANSMEIER IN SUPPORT
OF MOTION FOR A PRELIMINARY INJUNCTION
OR FOR SUMMARY JUDGMENT

Plaintiff Paul Hansmeier declares as follows:

1. My name is Paul Hansmeier. I am the plaintiff in the above-captioned action. I am over the age of 18 and am competent to testify to the matters discussed herein. Unless otherwise stated, the matters discussed below are to my personal knowledge.

2. I was subject to administrative detention from roughly June 5, 2021, to November 2, 2021.

3. The government has criticized my prior filings for not submitting enough detail about my administrative remedy submissions, so I am providing more detail here.

4. As the verified allegations in my amended complaint state, I was unable to access the logistical necessities of completing the administrative remedy process from administrative detention, a circumstance that contrasted

sharply with my experience in general population. For example, I had extreme difficulty securing administrative remedy forms from administrative detention; many times it was impossible to do so. In contrast, in general population and in response to the government's challenge to reexhaust my administrative remedies, I was able to readily secure five BP-8 forms that I used to begin the process of reexhausting my administrative remedies. A copy of these forms is attached.

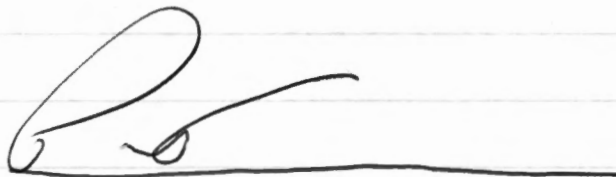
5. My process for exhausting my administrative remedies in light of the logistical challenges specified in the verified amended complaint was to attempt to exhaust my remedies every week. Specifically, I started by sending out a series of BP-8's via institutional mail. When I did not receive a response to those, I sent out a series of BP-9's, again via intra-institutional mail. When I did not receive a response to those, I sent out a series of BP-10's via U.S. mail. When I did not receive a response to those I sent out a series of BP-11's via U.S. Mail. When I could get an official form I used the form. When I could not get an official form, then I used notebook paper and wrote the name of the form at the top. In the overwhelming majority of cases I was forced to use notebook paper. I repeated this process quite a few times when I was administratively detained. The government/official capacity defendants' evidence omits most of my submission to my unit team/warden/region/and central offices. Based on these actions, I believe I did everything within my physical ability to exhaust my administrative remedies that were available.

6. As a separate issue, the official capacity defendants are claiming that they did not know that officers Mortenson and Dawson are being sued in their individual capacity. Though I do not have access

to copies of those forms, to the best of my recollection, the U.S. Marshall service forms allowed me to specify that those officers are being pursued in their individual capacities and I so specified. Those officers would have received copies of this form when they were served, to the best of my knowledge, so it is questionable that they are claiming to be unaware of my ^{individual} ~~official~~ capacity claims against them.

I state that the foregoing is true under the penalty of perjury to the best of my knowledge, information and belief.

August 23, 2022



Paul Hanzmeyer